

# CALIFORNIA CATTLEMEN'S ASSOCIATION

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SERVING THE CATTLE  
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January 26, 2009

Ms. Cynthia Bryant  
Director, Governor's Office of Planning and Research  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814  
Submitted via email: [ceqa.ghg@opr.ca.gov](mailto:ceqa.ghg@opr.ca.gov)

## RE: Comments on Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions

Dear Ms. Bryant:

The California Cattlemen's Association (CCA) appreciates the opportunity to comment on the Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions (CEQA revisions). CCA represents livestock producers throughout California who are committed to producing safe and nutritious animal protein products in the most environmentally efficient manner possible.

CCA has concerns that if the proposed CEQA revisions are implemented irresponsibly, economic growth opportunities for California ranchers and feedlot owners could be dramatically reduced. Livestock producers already face a myriad of economic challenges ranging from the current California drought, rising feed costs and the current financial and credit crisis which have made all business challenges worse.

In accordance with research, the state greenhouse gas inventory and the recently adopted AB 32 Scoping Plan, agriculture was not determined to be a significant source of greenhouse gas emissions. In turn, agriculture plays a crucial role in helping the state achieve AB 32 emission reduction goals through carbon sequestration. Statewide reductions in greenhouse gases cannot be achieved by regulation alone and federal, state and local government will need the assistance of agriculture to meet attainment goals.

The California Air Resources Board has recognized agriculture's contribution to carbon sequestration in the AB 32 Scoping Plan and Economic and Technology Advancement Advisory Committee Report. Ranchers that own and manage California's 34 million acres of privately and publicly owned rangelands play a significant role in sequestering greenhouse gas emissions through soil carbon sequestration and preserve working landscapes that might otherwise be developed and contribute to an increase in greenhouse gas emissions.



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In addition, naturally occurring emissions from the livestock sector should not be considered when determining the level of environmental impacts caused by a project. Naturally occurring emissions are those from manure and enteric fermentation which cannot be mitigated and are innate to the biological process. CCA suggests language be inserted in section 15064 that precludes lead agencies from having to assess livestock emissions to determine whether or not the project has a significant environmental impact on meeting the goals mandated under AB 32.

Similarly, if a project is required to develop mitigation measures as a result of the CEQA revisions, mitigation measures should not be required to reduce naturally occurring emissions from livestock. Likewise, language should be inserted in section 15126 that precludes a lead agency from being required to mitigate from the animal or manure.

California's beef cattle producers will continue to refine their operations voluntarily to increase production efficiency as new research becomes available relative to operational practices and animal nutrition. Increased regulations and permitting obstacles that may be created as a result of the implementation of a poorly developed and implemented CEQA revision will likely produce unacceptable economic impacts for California farmers and ranchers. CCA encourages further stakeholder collaboration on the proposed CEQA greenhouse policy to ensure that policies do not worsen the current economic crisis.

Once again, CCA appreciates the opportunity to comment on the CEQA revisions and should you have any additional questions, please don't hesitate to contact me.

Sincerely,

Justin Oldfield

Director of Industry Affairs



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